

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE,

Defendant.

Case No. 18 Cr. 00204 (NGG) (VMS)

AFFIDAVIT OF KEITH RANIERE

STATE OF NEW YORK)
COUNTY OF KINGS) s.s.:

KEITH ALAN RANIERE, having been duly sworn declares under penalty of perjury that the following statements are true and correct:


1. I am a Defendant in this action and submit this Affidavit in support of my Second Motion to Suppress the images the government alleges to be child pornography. The facts herein are based on my personal knowledge.
2. I submit this Affidavit in support of my argument that I have standing and a reasonable expectation of privacy in the property located at 8 Hale Drive, Halfmoon, NY 12065.
3. 8 Hale Drive is owned by Executive Housing & Properties, Inc, with a place of business at 455 New Karner Road, Albany, New York 12205.
4. 8 Hale Drive has been utilized by me as a private study and, at various times since Executive Housing & Properties bought it in 2004, as a place to live.

6. 8 Hale Drive contains my personal library of books, my notes, and other items of personal property.

7. I have always been within my legal rights to be at 8 Hale Drive, to keep my belongings at 8 Hale Drive, to sleep there, and I expect privacy in connection with my belongings.

8. Though 8 Hale Drive was unlocked at most times, anyone who wanted to enter 8 Hale Drive, would always ask my permission before entering the premises. There is no other person who has a greater right to be there or to use its premises.

Dated: April 21, 2019
Brooklyn, NY


KEITH ALAN RANIERE

Signed and sworn to before me on
21 day of April 2019


Notary Public

